

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)</p>	
<p>KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP 200 West 41st Street, 17th Floor New York, NY 10036-7203 Telephone: (212) 972-3000 Facsimile: (212) 972-2245 John E. Jureller, Jr. (JJureller@klestadt.com) Lauren C. Kiss (LKiss@klestadt.com)</p> <p><i>Counsel to Certain Former Directors and Officers of Immune Pharmaceuticals Inc.</i></p>	
<p>In re:</p> <p>IMMUNE PHARMACEUTICALS INC.,</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 7</p> <p>Case No.: 19-13273 (VFP)</p> <p>Hearing Date and Time: May 5, 2020 at 10:00 a.m. (Eastern Time)</p> <p>Objection Deadline: April 28, 2020 ORAL ARGUMENT WAIVED UNLESS OBJECTION(S) FILED</p>

**NOTICE OF MOTION OF CERTAIN FORMER DIRECTORS AND OFFICERS OF
IMMUNE PHARMACEUTICALS INC. FOR ENTRY OF AN ORDER AUTHORIZING
PAYMENT AND/OR ADVANCEMENT OF DEFENSE COSTS
UNDER IMMUNE PHARMACEUTICALS INC.'S
DIRECTORS AND OFFICERS INSURANCE POLICY**

PLEASE TAKE NOTICE, that on **May 5, 2020 at 10:00 a.m. (Eastern Time)**, Anthony Fiorino, M.D. ("Fiorino"), Daniel Kazado ("Kazado"), Daniel Teper, M.D. ("Teper"), Jeffrey Paley, M.D. ("Paley"), and John Neczesny ("Neczesny", collectively the "Former D&Os"), certain current and former directors and officers of Immune Pharmaceuticals Inc., by and through their undersigned counsel, Klestadt Winters Jureller Southard & Stevens, LLP, shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, at the United States Bankruptcy Court, District of New Jersey, Martin Luther King Jr. Federal Building, 50 Walnut Street, Courtroom 3B, Third Floor, Newark, New Jersey 07102, for entry of an order substantially in the form submitted herewith (the "Proposed Order"), authorizing the payment and/or advancement of defense costs to the Former D&Os under that certain public company directors and officers insurance policy held by Immune Pharmaceuticals Inc. (the "Motion").

PLEASE TAKE FURTHER NOTICE, that in support of the Motion, the Former D&Os will rely on the accompanying Memorandum of Law that sets forth the relevant factual and legal bases upon which the Motion should be granted and the Certification of John E. Jureller, Jr. A Proposed Order granting the relief requested in the Motion is also being submitted herewith.

PLEASE TAKE FURTHER NOTICE, that objections (an “Objection”), if any, to the Motion shall be filed with the Clerk of the United States Bankruptcy Court, District of New Jersey, with copies served simultaneously upon counsel to the Former D&Os, Attn: John E. Jureller, Jr. and Lauren Kiss, Klestadt Winters Jureller Southard & Stevens, LLP, 200 West 41st Street, 17th Floor, New York, New York 10036-7230 by **5:00 p.m. Prevailing Eastern Time on April 28, 2020** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE, that Objections to the relief sought in the Motion, if any, must (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; and (c) state with particularity the legal and factual basis for such Objection.

PLEASE TAKE FURTHER NOTICE, that unless an Objection is timely filed and served by the Objection Deadline, the relief requested in the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing¹.

PLEASE TAKE FURTHER NOTICE, that unless an Objection is timely filed and served by the Objection Deadline, the undersigned waives oral argument on the return date of the Motion.

Dated: New York, New York
April 8, 2020

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

By: /s/John E. Jureller, Jr.
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¹ In addition to D.N.J. LBR 9013-3(d), pursuant to the Court’s *General Order Regarding Court Operations Under Exigent Circumstances Created by Coronavirus (COVID 19)*, all motions will be presumed to be heard on the papers, unless oral argument is requested and thereafter permitted by the Court.